

UNITED STATES DISTRICT COURT
FOR DISTRICT OF MARYLAND

MICHAEL SINDRAM
6817 Georgia Ave., N.W. #204
Washington, D.C. 20012

Plaintiff,

v.

TAMARA SAUNDERS
2118 Mitchell Building
College Park, MD 20742-5221

JOHN ZACKER
2118 Mitchell Building
College Park, MD 20742-5221
Defendants.

FILED
LOGGED
ENTERED
RECEIVED

OCT 19 2005

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
MONTGOMERY COUNTY

Civil Action No.

* * * *

VERIFIED COMPLAINT

1. Law (Messitte, J.) of this weighty meritorious Case: ***"Plaintiff was wrongfully expelled from University of Maryland, which might well be actionable."*** United States Court of Appeals for Fourth Circuit No.05-1548, et al.; ***"In dismissing without prejudice Sindram's Complaint, court instructed Sindram as to deficiencies in the Complaint and how they may be cured. Because Sindram may refile his Complaint, dismissal order is interlocutory and not appealable."*** Deficiencies are now cured in this instant **Verified Complaint** so that Plaintiff awaits his day in court on merits in this weighty cause of action. Fourth Circuit has recognized an ***"indisputable desire that those litigants with meritorious claims should not be tripped up in court on technical niceties."*** **Beaudett v. City of Hampton**, 755 F.2d 1277-78 [citing **Gordon v. Leeke**, 574 F.2d 1147 (4th Cir. 1978)]. In a per curiam opinion, expressing unanimous views of United States Supreme Court, it was held that since it did not appear beyond doubt that Plaintiff could prove no set of facts in support of his claim which would entitle him to relief, he was entitled to an opportunity to offer proof. **Haines v. Kerner**, 404 U.S. 519 (1972). Such is now posture of Plaintiff's instant weighty meritorious **Verified Complaint**.

2. Plaintiff is an indigent disabled Veteran who has served our country more than most! Plaintiff's disabilities and medical conditions are recognized by Department of Veterans Affairs, Social Security Administration, and numerous current doctors and treating physicians. As more fully described below jurisdiction of court founded on 42 USC §1981 *et seq.*; United States Constitution Amendments I, V, VI, VII, and XIV; Americans with Disabilities Act of 1990 (ADA); Family Education Rights and Privacy Act (FERPA); and Plaintiff's precious preferred constitutionally-guaranteed right to an education which defendants continue to rape Plaintiff of his rights with impunity jointly,

severally, collectively, and individually for which they should now be held accountable and liable.

3. Tamara Saunders is a black female administrator of Maryland University (MU) at time Plaintiff (non-black) attended this institution of “higher learning” to orchestrate vicious racially-motivated hate crimes upon Plaintiff on or about October 2004 by her black male counterpart Ean Vessels and others in a given course taken by Plaintiff. Defendant Saunders used her position as an MU administrator to create a hostile classroom environment so as to continually disrupt Plaintiff’s course of study, indefinitely devalue Plaintiff’s earned grades, indefinitely withhold Plaintiff’s earned transcript, indefinitely withhold Plaintiff’s earned diploma, cause Plaintiff’s unconstitutional expulsion/suspension from MU that continues to work reputational and economic harms and injuries against Plaintiff to cause Plaintiff irreparable mental anguish, psychological deprivation, and loss of the enjoyment of life and of living.

4. John Zacker is in same office as defendant Saunders and is complicit in her racially-motivated attacks upon Plaintiff described above since Plaintiff was required to meet with defendant Zacker following these hate crimes and other assaults orchestrated by defendants. Defendant Zacker also used his position as an MU administrator to create a hostile classroom environment so as to continually disrupt Plaintiff’s course of study, indefinitely devalue Plaintiff’s earned grades, indefinitely withhold Plaintiff’s earned transcript, indefinitely withhold Plaintiff’s earned diploma, cause Plaintiff’s unconstitutional expulsion/suspension from MU that continues to work reputational and economic harms and injuries against Plaintiff to cause Plaintiff irreparable mental anguish, psychological deprivation, and loss of the enjoyment of life and of living.

5. Defendants procured Plaintiff’s confidential privileged medical records to obfuscate his MU Disability Support Services Classroom Accommodations so as to libel, slander, defame, and put Plaintiff in false light and to make unwarranted assaults upon Plaintiff’s good name and integrity that continues to work reputational and economic harms and injuries against Plaintiff to cause Plaintiff irreparable mental anguish, psychological deprivation, and loss of the enjoyment of life and of living.

6. Defendants procured Plaintiff’s confidential privileged education records so as to libel, slander, defame, and put Plaintiff in false light to satisfy an extra-judicial claim instituted as a private matter to achieve an end unintended by law and in fact having had that intended effect that continues to work reputational and economic harms and injuries against Plaintiff to cause Plaintiff irreparable mental anguish, psychological deprivation, and loss of the enjoyment of life and of living.

7. Plaintiff embraces well-founded Intelligent Design (*Fools say to themselves, “There is no God!” Psalms 14:1; 53:1, TEV*) but for defendants’ established religion of avowed agnostic atheistic promotion of Darwinian evolution (makes about as much sense from womb of woman comes baboon and from womb of baboon comes man) and “big bang” theory (makes about as much sense that a building explodes producing Webster’s Dictionary) to continually muzzle Plaintiff’s freedom of speech, expression and thought to directly contravene our preferred United States Constitution Amendment I to cause Plaintiff irreparable mental anguish, psychological deprivation, and loss of the enjoyment of life and of living.

8. Defendants’ wanton and willful malicious misconduct and total disregard of Plaintiff’s rights and interests are “in the *‘clear absence of jurisdiction’*” violating due

process, fundamental fairness, equal protection of the law, and equal treatment under the law. **William v. Rappeport**, 699 F.Supp. 501, 506 (D.Md. 1988) quoting from **Stump v. Sparkman**, 435 U.S. 349, 356-7, 98 S. Ct. 1099, 1105, 55 L.Ed. 2d 331 (1978), “...immunity was not designed to insulate anyone from all aspects of public accountability.” 409 U.S. at 31. Defendants continue to violate Plaintiff’s constitutionally-guaranteed civil rights cognizable under 42 USC § 1981 *et seq.*, United States Constitution Amendments I, V, VI, VII, and XIV; ADA; FERPA; and Plaintiff’s precious preferred constitutionally-guaranteed right to an education in a non-threatening environment made hostile by defendants so that Plaintiff fears for his safety, well-being and life in addition to reputational and economic harms and injuries continually suffered by Plaintiff at hands of defendants. ***When rights of one are violated rights of all are endangered! Injustice anywhere is a threat to justice everywhere!*** [Martin King].

WHEREFORE, Plaintiff, Michael Sindram, *pro-se*, respectfully requests that this Honorable Court find defendants Saunders and Zacker jointly and severally liable for all injuries, damages, and violations suffered by him, and that judgment be entered against defendants Saunders and Zacker jointly, severally collectively, and individually, as follows:

1. Compensatory and General damages in amount of One Million Seven Hundred Fifty Thousand Dollars (\$1,750,000.00);
2. Punitive Damages in amount of One Million Dollars (\$1,000,000.00);
3. Costs, Disbursements, and Reasonable Award of Expenses for Plaintiff to vigorously prosecute this weighty meritorious cause of action in amount of Eighty Thousand Dollars (\$80,000.00);
4. Such other and further relief as to the Court appears just and proper.

In God we trust:

Michael Sindram
Michael Sindram, Plaintiff, *Pro-Se*
6817 Georgia Ave., N.W. #204
Washington, D.C. 20012
(202)722-6281

REQUEST FOR HEARING

In light of pre-filing burden placed upon Plaintiff and Motion For Temporary Restraining Order annexed hereto hearing hereby requested as to all issues herein to be advanced on Court’s calendar to earliest practicable date.

Michael Sindram
Michael Sindram

JURY DEMAND

Jury Demand hereby made as to *all* issues herein as guaranteed by our United States Constitution Amendment VII.

Michael Sindram
Michael Sindram

VERIFICATION

District of Columbia:

I, Michael Sindram, Plaintiff, *pro-se*, in this weighty meritorious cause of action, being first duly sworn on Oath, do depose and state that I have personal information and knowledge of foregoing information and facts, and further state that said information and facts are true and accurate to best of my information, knowledge and belief.

Michael Sindram
Michael Sindram

Subscribed and sworn to before me this 19 day of October, 2005.

Boel Greene
Notary Public

SP US Army

My Commission expires:

up AR 27-55 para 2-2a(2)

You go to court, but you do not have justice on your side. You depend on lies to win your case. You carry out your plans to hurt others. Evil plots you make are as deadly as eggs of a poisonous snake. Crush an egg, out comes a snake! But your plots will do you no good—they are as useless as clothing madder of cobwebs! You are always planning something evil, and you can hardly wait to do it. You never hesitate to murder innocent people. You leave ruin and destruction wherever you go, and no one is safe when you are around. Everything you do is unjust. You follow a crooked path, and no one who walks that path will ever be safe.

Isaiah 59:4-8 (TEV)

Make it your aim to do what is right, not what is evil, so that you may live. Hate what is evil, love what is right, and see that justice prevails in the courts...let justice flow like a stream, and righteousness like a river that never goes dry.

Amos 5:14a, 15a, 24 (TEV)

Do for others what you want them to do for you!

Matthew 7:12a (TEV)